

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CHICAGO TILE INSTITUTE	)	
WELFARE PLAN, CHICAGO TILE	)	
INSTITUTE PENSION PLAN, AND	)	
CERAMIC TILE, TERRAZZO, & GRANITE	)	
CUTTERS UNION LOCAL NO. 67,	)	08 C 108
	)	Judge Gottschall
v.	)	
	)	
SHAMROCK TILE & MARBLE, LLC.	)	
	)	
Defendant.	)	

Attorney fee Affidavit in Support of  
Motion for Judgment by Default

NOW COMES MICHAEL J. MCGUIRE, who after being duly sworn upon oath, states as follows:

1. I am an associate of Gregorio & Associates and am licensed to practice law in the State of Illinois and for the Northern District of Illinois.
2. I have personal knowledge of the facts stated herein and if called to testify in this matter, I can competently testify to such facts from my own such knowledge.
4. The Collective Bargaining Agreement and the Trust Agreements under which this action is based provide for the payment of liquidated damages, audit fees and attorneys' fees and costs incurred for failure of a signatory contractor to pay contributions in accordance with those agreements.
5. I devoted six (6.0) hours in connection with the above-captioned case at the rate of \$160.00 per hour resulting in attorney's fees totaling \$960.00. In addition the senior attorney Mr. Frank Marco devoted one half hour in connection with the above-captioned case at the rate of \$205.00 per hour resulting in attorney's fees of \$102.50.
6. In addition, the filing fee was \$350.00 and the process server fee was \$160.00.

I certify that the foregoing costs and attorneys fees totaling \$1,572.50 were necessary and reasonable.



Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure [735 ILCS 5/1-109], the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to matters the undersigned certifies as aforesaid that he verily believes the same to be true.

By:   
MICHAEL J. MCGUIRE